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June 25, 2002

Via Hand Delivery

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: MA D.T.E. 02-8

Dear Secretary Cottrell:

The procedural schedule in the above referenced matter requires parties to notify the Department by today of a request for further testimony in response to Verizon's Panel Surrebuttal Testimony, filed with the Department on June 18, 2002. AT&T Communications of New England, Inc. ("AT&T") hereby requests an opportunity to file further testimony in response to Verizon's June 18 filing, as a number of statements made by Verizon in that testimony demand clarification, context and rebuttal. AT&T will file this additional testimony by June 28, 2002, the procedural deadline established by the Department.

Verizon's Panel Surrebuttal Testimony exhibits several flawed security concepts by failing to account for the relative costs associated with its proposed and alternative security measures. Verizon's testimony also ignores the extensive anti-competitive effects widespread virtual collocation would occasion, and does not recognize the deterrence value of several simple, low-cost measures that could be implemented in central offices at present. If permitted to file rejoinder testimony, AT&T will address the specific flaws in Verizon's testimony.

For these reasons, AT&T believes responsive testimony is necessary for a more complete and balanced record. AT&T respectfully requests an opportunity to file this testimony by June 28, 2002.

Sincerely,

John T. Bennett

JTB/jml

cc: Hearing Officer
Service List